

in the '304 publication do not correspond with the abstract, specification and original claims of the present application. It appears that the title, inventor's name, correspondence address, assignee, application number, filing date, domestic and foreign priority date, etc. are correct as published in the '304 publication. The Applicant notes that the abstract, specification and original claims as shown in the Image File Wrapper for the present application are correct. As such, it appears that the Patent Office improperly matched information (the title, inventor's name, correspondence address, assignee, application number, filing date, domestic and foreign priority date, etc.) from the present application with the abstract, specification and original claims of another application. Therefore, the Applicant respectfully requests that the '304 publication be rescinded and republished so that it contains the abstract, specification and original claims of the present application as shown in the Image File Wrapper.

Claims 1-19 are pending in the present application, of which claims 1-5, 8 and 11 are independent. The Applicant notes with appreciation the allowance of claims 11, 12 and 19. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 3 of the Official Action rejects claims 1-4 as obvious based on the combination of U.S. Patent No. 5,847,688 to Ohi and U.S. Patent No. 5,049,998 to Lee. The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness. Paragraph 4 of the Official Action rejects claims 5-10 as anticipated by Ohi. The Applicant respectfully traverses the rejection because the Official Action has not established an anticipation rejection.

As stated in MPEP § 2131, to establish an anticipation rejection, each and every element as set forth in the claim must be described either expressly or inherently in a single prior art reference. Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or

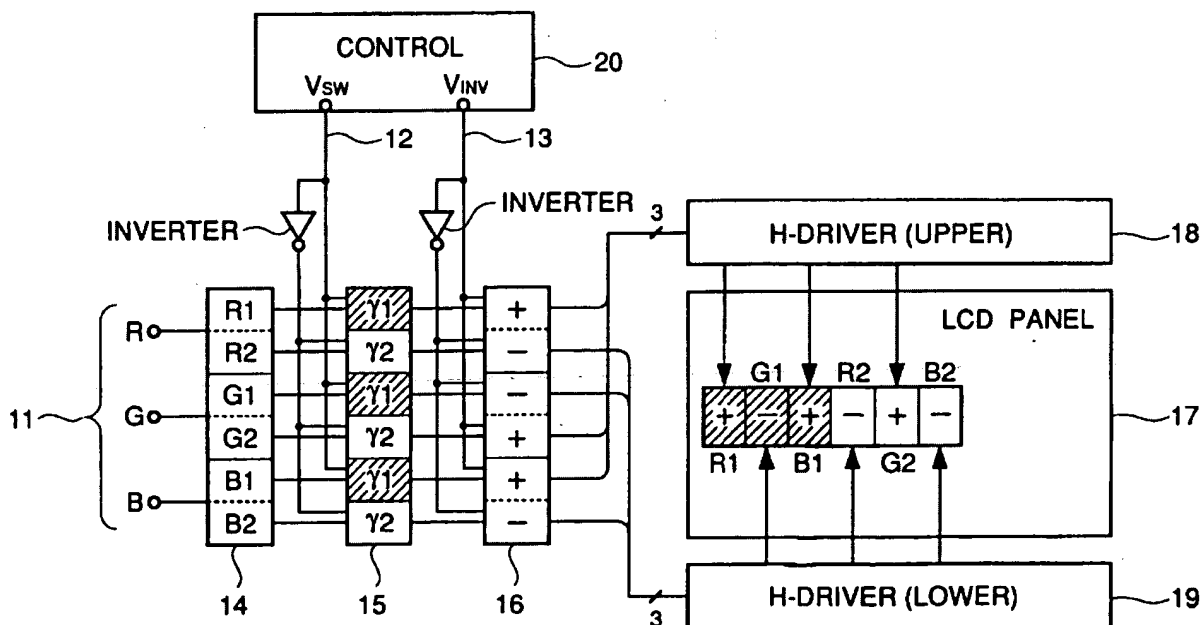
motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach, either explicitly or inherently, or suggest all the features of the independent claims. Independent claims 1-5, 8 and 11 recite inputting a pair of video signals to one source driver circuit (see, for example, 105 in Figure 1). For the reasons provided below, Ohi does not teach, either explicitly or inherently, or suggest the above-referenced features of the present invention.

In the "Response to Arguments" section, the Official Action asserts that Ohi teaches "inputting a pair of video signals to one horizontal driver (3) composed of H-driver (upper) (18) and H-driver (lower) (19) (see Fig. 6)" and that drivers 18 and 19 "are a single horizontal driver (3) as seen in Figure 6" (page 2, Official Action mailed 06/13/2006). The Applicant respectfully disagrees and traverses the assertions in the Official Action.

Initially, it is noted that reference character "3" in Ohi is used to denote the control terminal 3 shown in Figure 4 and described at column 4, line 65. The control

FIGURE 6



Lee does not cure the deficiencies in Ohi. Please see the detailed discussion of Lee beginning at page 10 of the *Amendment* filed April 11, 2006. Also, the “Response

to Arguments" does not appear to address the Applicant's argument that Lee is not analogous prior art. Please incorporate by reference the arguments regarding the lack of motivation to combine Ohi and Lee beginning at page 10 of the *Amendment* filed April 11, 2006.

Since Ohi and Lee do not teach, either explicitly or inherently, or suggest the above-referenced features of the present invention, an anticipation rejection cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. §§ 102 and 103 are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



---

Eric J. Robinson  
Reg. No. 38,285

Robinson Intellectual Property Law Office, P.C.  
PMB 955  
21010 Southbank Street  
Potomac Falls, Virginia 20165  
(571) 434-6789